

Exhibit A

NITESH N. BHAGAT

785 Chelsea Glenn Rd. Clarksboro, NJ 08020 • Phone: (732) 824-8085
 niteshbhagat@gmail.com

WORK EXPERIENCE

<i>Regional Diagnostic Imaging, LLC</i>	<i>March 29 2010-present</i>
Staff Diagnostic Radiologist	
1505 W. Sherman Ave	
Vineland, NJ 08360	
<i>Radiology Associates of the Mainline</i>	<i>July 1 2009-March 26 2010</i>
Staff Diagnostic Radiologist	
407 Longview Dr.	
West Chester, PA 19380	
<i>Combined Neuro/MSK MRI Fellowship</i>	<i>July 1 2008-June 30 2009</i>
Thomas Jefferson University Hospital	
132 S. 10 th St. Suite 1072	
Philadelphia, PA 19107	
<i>Diagnostic Radiology Residency</i>	<i>July 1 2004-June 30 2008</i>
Certified by the American Board of Radiology	<i>June 03, 2008</i>
Thomas Jefferson University Hospital	
132 S. 10 th St. Suite 1072	
Philadelphia, PA 19107	
<i>Transitional Internship</i>	<i>July 1 2003-June 30 2004</i>
Detroit Medical Center/Wayne State University	
6071 W. Outer Dr., Detroit, MI 48235	
<i>Tutor in Gross Anatomy</i>	<i>Aug 2000-Aug 2001</i>
Wayne State University School of Medicine	
Detroit, Michigan	
<i>Home Health Care Worker</i>	<i>May 1997-July 1999</i>
Interdependence Inc., Sterling Heights, Michigan	
Assisted handicapped individuals with activities of daily living.	

EDUCATION

<i>Doctor of Medicine</i>	<i>Aug 1999-Jun 2003</i>
Wayne State University School of Medicine	
540 E. Canfield Detroit, MI 48201	
<i>Bachelor of Science in Biology</i>	<i>Sept 1994-May 1998</i>
University of Michigan	
Ann Arbor, Michigan 48103	

VOLUNTEER ACTIVITIES

Hospital Volunteer Sept 1995-May 1997
University of Michigan Hospital
 Ann Arbor, Michigan 48103

Home Construction Volunteer Sept 1996-May 1997
Habitat for Humanity, Ann Arbor, Michigan

LANGUAGES**Hindi, Gujarati****ASSOCIATION MEMBERSHIPS**

Alpha Omega Alpha Honor Medical Society 2002
Phi Kappa Phi Honor Society 1998
Golden Key National Honor Society 1996

AWARDS & HONORS

Year end honors after the 1st, 2nd, and 3rd years of medical school

James B. Angell Scholar at the University of Michigan 1998

Two time Class Honors at the University of Michigan 1996,1997

PRESENTATIONS:

Oral Presentation: Bhagat N, Zoga A, Morrison W. "Meniscal Tear Criteria at Low Field Strength: Correlation of Findings on a 0.3T Open System with Arthroscopy". 5/10/2007. American Roentgen Ray Society. Orlando, Florida.

ACR Case in Point web based presentation: Bhagat N, Thomas J. "Polyarteritis Nodosa". 1/09/2008. www.acr.org.

ACR Case in Point web based presentation: Bhagat N, Gupta N. "Cystic Bronchiectasis". 10/04/2006. www.acr.org.

ACR Case in Point web based presentation: Bhagat N, Kim S. "Carney Triad". 2/27/2006. www.acr.org.

Exhibit B

LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY
A LIMITED LIABILITY COMPANY

RUDDOLPH A. SOCEY, JR., P.C.^{**}

ROLAND R. FORMIDONI

ROBERT P. CASEY, P.C.

GREGORY J. GIORDANO[†]

JEREMY P. COOLEY^{††}

JOSEPH R. LANG

COUNSELLORS AT LAW
3131 PRINCETON PIKE - 1B, SUITE 104
LAWRENCEVILLE, NEW JERSEY 08648

(609) 896-2000

FAX (609) 895-1693

MICHAEL J. HERON^{*}
ROBERT F. CASEY, P.C.
PATRICK F. CARRIGG^{***}
CASEY R. LANGE
MICHAEL A. PATTANITE, JR.
MICHAEL J. MASSILLI

GEORGE WILGUS, III^{**}
OF COUNSEL
SAMUEL D. LENOX
1922-1975

^{*} MEMBER OF N.J. AND P.A. BAR

^{**} MEMBER OF N.J. & N.Y. BAR

^{***} MEMBER OF N.J. & N.Y. BAR

CERTIFIED AS A CIVIL TRIAL ATTORNEY

January 18, 2013

Michael F. Barrett, Esq.
Saltz, Mongeluzzi, Barrett & Bendesky, P.C.
8000 Sagemore Drive, Suite 8303
Marlton, NJ 08053

Re: Ramos v Bhagat
Docket No.: CUM-L-994-12

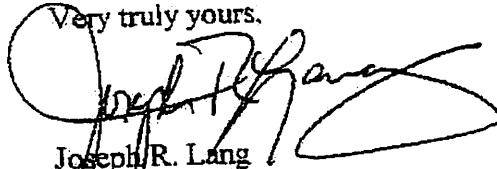
Dear Mr. Barrett:

Please be advised that I represent Dr. Nitesh Bhagat in the above-referenced matter. I enclose herewith a copy of the Answer I have sent for filing on behalf of this defendant. Please advise me of the name and address of any other attorneys representing other parties in this case.

A demand is hereby made for Answers to Uniform Interrogatories Form A(1) and Supplemental Interrogatories to be answered by your client. The Supplemental Interrogatories are enclosed. Please have the Interrogatories answered within the time prescribed by the Rules of Court. I have further enclosed a Notice for Production of Documents to be answered within the time prescribed by the Rules of Court. I have further enclosed a notice to take the videotaped deposition of the plaintiff.

Thank you for your cooperation in this regard.

Very truly yours,


Joseph R. Lang
For the Firm

JRL:ldz
Enclosures

Case 1:13-md-02419-FDS Document 605 Filed 12/05/13 Page 11 of 43

**LENOX, SOCEY, FORMIDONI, GIORDANO,
COOLEY, LANG & CASEY, LLC
3131 Princeton Pike, Building 1B, Suite 104
Lawrenceville, New Jersey 08648
(609) 896-2000
Attorneys for Defendant, Nitesh Bhagat, M.D.**

JOSE A. RAMOS. v. NEW ENGLAND COMPOUNDING PHARMACY, INC., d/b/a NEW ENGLAND COMPOUNDING CENTER. AMERIDOSE LLC, ALAUNUS PHARMACEUTICAL, LLC, SOUTH JERSEY HEALTHCARE, SOUTH JERSEY REGIONAL MEDICAL CENTER, NITESH BHAGAT, M.D., JOHN DOE(S) CORPORATIONS (1-4), and JOHN DOE(S), M.D. (1-3).	Plaintiff Defendants	SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CUMBERLAND COUNTY DOCKET NO.: CUM-L-994-12 CIVIL ACTION NOTICE TO PRODUCE
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PLEASE TAKE NOTICE that on February 22, 2013 at 10:00 a.m. at the offices of LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY, LLC, demand is hereby made pursuant to R. 4:18, for the following:

TAKE FURTHER NOTICE, that this demand shall be a continuing one so that any documents subsequently obtained which are requested pursuant to the categories herein shall be produced in accordance with the provisions of R. 4:18, as soon as is practical.

1. Affidavit of Merit;
2. All medical records and correspondence from all of plaintiff's treating and/or examining physicians, dentists, chiropractors and/or other practitioners of the medical arts relating in any way to the claims in the instant litigation.
3. Complete medical charts from all medical institutions for in-patient and/or out-patient treatment and/or diagnostic studies, including original radiographic films and billing information.
4. All correspondence and documents forwarded by plaintiff or plaintiff's counsel, or on behalf of plaintiff's counsel by third parties, to any expert expected to testify at trial.
5. The entire file maintained by experts whom plaintiff intends to call at trial including, but not limited to, any notes or draft reports, billing statements, x-ray films and/or other studies.
6. All documents, papers, records, photographs, diagrams, movies and any other things which relate in any way to this action which plaintiff intends to utilize in any manner or offer as evidence at the trial of this matter.

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7. All medical bills for which recovery is sought, together with all reports, studies and/or other writings which set forth the amount of medical bills which the plaintiff has incurred or may incur in the future.

8. All bills, invoices, cancelled checks and/or any other documents, papers, records or writing, evidencing monetary expenses for which recovery is sought.

9. All correspondence or other documents which relate to a third-party payment of medical or hospital bills or other bills for which recovery is sought, including but not limited to correspondence between treating physicians, and third-party medical, disability and workers' compensation insurance providers.

10. All correspondence and memoranda of conversation between plaintiff and defendant and/or plaintiff's attorney and defendant.

11. Copies of all medical records in plaintiff's possession.

12. Reports and CV of any proposed experts.

13. Any and all reports from treating physicians.

14. Any and all statements taken or obtained including, but not limited to, summaries of oral statements or interviews.

15. All records obtained from this answering party, as well as any other answering party.

16. Copies of all correspondence and pleadings exchanged between plaintiff's counsel and any other answering defendant.

17. Copies of the exact pages of any and all published treatises, periodicals, articles, pamphlets or any other written literature that plaintiff or plaintiff's expert(s) will offer as substantive evidence at the time of trial.

18. Copies of the exact pages of any and all published treatises, periodicals, articles, pamphlets or any other written literature that plaintiff will offer as substantive evidence or rely upon at the time of trial to examine or cross-examine any witness or expert witness.

19. Identify and attach hereto copies of any and all published treatises, periodicals, articles, pamphlets, or other literature authored or co-authored by plaintiff's experts which pertain to the subject matter of this case.

20. Copies of any and all statement(s) and/or testimony under oath by defendant in plaintiff's or plaintiff's attorney's possession.

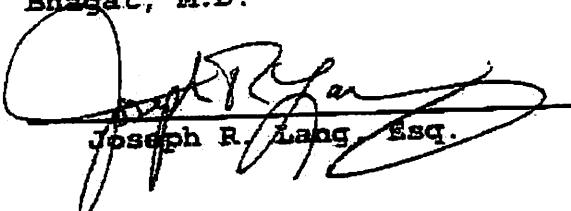
Case 1:13-md-02419-FDS Document 605 Filed 12/05/13 Page 15 of 43

21. A complete and true copy of plaintiff's health insurance card and/or health card in effect at the time of the alleged injury and for each year subsequent thereto.

22. Provide all written documentation of plaintiff's entitlement to Medicare at the time of the alleged injury and for any year through the present.

23. A complete and accurate list of any and all medical expenses paid on behalf of plaintiff by Medicare along with copies of any documentation regarding said payments.

LENOX, SOCEY, FORMIDONI, GIORDANO,
COOLEY, LANG & CASEY, LLC
Attorneys for Defendant, Nitesh
Bhagat, M.D.


Joseph R. Lang, Esq.

DATED: January 18, 2013

Exhibit C

Case 1:13-md-02419-FDS Document 605 Filed 12/05/13 Page 17 of 43



SALTZ MONGELUZZI
BARRETT & BENDESKY P.C.
TRIAL LAWYERS

DELAWARE COUNTY OFFICE
20 WEST THIRD STREET
P.C. Box 1670
MEDIA, PA 19063
VOICE 610.627.9777
FAX 610.627.9787

ONE LIBERTY PLACE, 52ND FLOOR
1650 MARKET STREET
PHILADELPHIA, PA 19103
VOICE 215.496.8282
FAX 215.496.0999

NEW JERSEY OFFICE
8000 SAGEMORE DRIVE
SUITE 8303
MARLTON, NJ 08053
VOICE 856.751.8383
FAX 856.751.0868

MICHAEL F. BARRETT
DIRECT DIAL (215) 575-2986
MFBARRETT@SMBB.COM

MARY T. GIDARO
DIRECT DIAL (215) 575-2978
MTGIDARO@SMBB.COM

MONTGOMERY COUNTY OFFICE
43 EAST MARSHALL STREET
NORRISTOWN, PA 19401
VOICE 610.278.1591
FAX 610.272.2549

March 13, 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Joseph R. Lang, Esquire
LENOX SOCEY FORMIDONI
GIORDANO COOLEY LANG & CASEY
3131 Princeton Pike -1B
Lawrenceville, NJ 08648

Stephen A. Grossman, Esquire
MONTGOMERY, McCracken,
WALKER & RHOADS, LLP
Liberty View, Suite 600
457 Haddonfield Road
Cherry Hill, NJ 08002

Re: *Rivera v. New England Compounding Center, et al.*
Ramos v. New England Compounding Center, et al.

Dear Counsel:

Pursuant to N.J.S.A. 2A:53A-26, enclosed please find the Affidavits of Merit of Brian Currie, M.D., regarding South Jersey Healthcare, South Jersey Regional Medical Center, Nitesh Bhagat, M.D. and John Doe(s), M.D., in connection with the above-referenced matters.

If you have any objections, please contact us as soon as possible to discuss same.

Very truly yours,

SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.

Mary T. Gidaro
MICHAEL F. BARRETT
MARY T. GIDARO

/bp
Enclosures

Exhibit D

SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.
8000 Sagemore Drive
Suite 8303
Marlton, NJ 08053
856-751-8383 (tele)
856-751-0868 (fax)
ATTORNEYS FOR PLAINTIFF

Plaintiff,
JOSE A. RAMOS,
vs.

SUPERIOR COURT OF NJ
CUMBERLAND COUNTY
LAW DIVISION

Defendants,
NEW ENGLAND COMPOUNDING
PHARMACY, INC., d/b/a NEW ENGLAND
COMPOUNDING CENTER; AMERIDOSE,
LLC; ALAUNUS PHARMACEUTICAL, LLC;
SOUTH JERSEY HEALTHCARE; SOUTH
JERSEY REGIONAL MEDICAL CENTER;
NITESH BHAGAT, M.D.; JOHN DOE(S)
CORPORATIONS (1-4); JOHN DOE(S), M.D.
(1-3).

Docket No. CUM-L-0904-12
CIVIL ACTION
AFFIDAVIT OF MERIT

Brian Currie, M.D., of full age, being duly sworn according to law, upon his oath,
deposes and says:

1. I am a physician currently licensed to practice medicine in New York.
2. I have been Board Certified in Infectious Diseases since 1994.
3. I have been the Vice President and Medical Director of Research for at least five years and have devoted the majority of my professional time for the year prior to 9/10/2012 to hospital administration and Joint Commission (JCAHO) preparedness; also I have been responsible for the oversight of infection control activities at Montefiore Medical Center since 1991; also from 2006 to the present I have been a Professor of Medicine and Professor of Epidemiology and Population Health at Albert Einstein College of Medicine.

4. In my opinion, there exists a reasonable probability that the care, skill and knowledge exercised by South Jersey Healthcare, South Jersey Regional Medical Center, Nitesh Bhagat, M.D. and John Doe(s), M.D., in the treatment and/or care of Jose A. Ramos fell outside the acceptable professional standards and practices.

5. I have no financial interest in the outcome of this litigation.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Brian Currie MD
BRIAN CURRIE, M.D.

Vernell Devarro
NOTARY PUBLIC - STATE OF NEW YORK
No. 03-1377914
Qualified to Notarize
2015

Sworn to and subscribed before

me this 6 day of March 2013
Vernell Devarro
NOTARY PUBLIC
New York State, Bronx County

NOTICE:

If any defendants contends that this Affidavit of Merit fails to completely satisfy the requirements of the Affidavit of Merit Statute N.J.S.A. 2A:53A-26 et seq. and/or The New Jersey Medical Care Access and Responsibility and Patients First Act of 2004, N.J.S.A. 2A:53A-38 et seq. in any way, demand is hereby made that the defendant immediately notify the plaintiff of any such alleged deficiencies so that same may be corrected if necessary and within the time constraints of N.J.S.A. 2A:53A-26 et seq.

Exhibit E

LENOX, SOCEY, FORMIDONI, GIORDANO, COOLEY, LANG & CASEY

A LIMITED LIABILITY COMPANY

COUNSELLORS AT LAW

3131 PRINCETON PIKE - 1B, SUITE 104

LAWRENCEVILLE, NEW JERSEY 08648

RUDOLPH A. SOCEY, JR., P.C.†

ROLAND R. FORMIDONI

ROBERT P. CASEY, P.C.

GREGORY J. GIORDANO†

JEREMY P. COOLEY†

JOSEPH R. LANG†

MICHAEL J. HERON*

ROBERT F. CASEY, P.C.

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AMBika SHANI*

(609) 896-2000

FAX (609) 895-1693

SAMUEL D. LENOX

1922-1975

*MEMBER OF N.J. AND PA. BAR

**MEMBER OF N.J. PA & N.Y. BAR

***MEMBER OF N.J. & N.Y. BAR

CERTIFIED AS A CIVIL TRIAL ATTORNEY

September 25, 2013

Michael F. Barrett, Esq.
Saltz, Mongeluzzi, Barrett & Bendesky, P.C.
8000 Sagemoore Drive, Suite 8303
Marlton, NJ 08053

Re: Ramos v Bhagat
MDL No. 1:13-md-2419-FDS

Dear Mr. Barrett:

I am in receipt of plaintiff's Affidavit of Merit from Dr. Brian Currie concerning the above referenced matter. I object to this Affidavit as it is insufficient and does not meet the statutory requirements. Specifically, based upon the New Jersey Supreme Court in the case of Nicholas v. Mynster issued in April of this year, you are required to produce an Affidavit of Merit from a physician who specializes in the same specialty as Dr. Bhagat. Dr. Currie is not board certified in the same specialty with which Dr. Bhagat is board certified. Since the Answer to your Complaint was filed on behalf of Dr. Bhagat on July 11, 2013, the plaintiff has until November 8, 2013 within which time to serve a proper Affidavit of Merit or a motion to dismiss will be filed.

Please be guided accordingly.

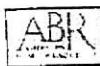
Very truly yours,

Joseph R. Lang
For the Firm

JRL:klm

cc: Frederick H. Fern, Esq.
Franklin H. Levy, Esq.
Walter F. Timpose, Esq.
Matthew Moriarty, Esq.
Stephen A. Grossman, Esq.

Exhibit F



AMERICAN
BOARD of RADIOLOGY

General Information

About the ABR

RADIOLOGY SPECIALTIES AND SUBSPECIALTIES

What is a Radiologist?

A radiologist is a physician who uses imaging methodologies to diagnose and manage patients and provide therapeutic options. The American Board of Radiology (ABR) certifies physicians and physicists practicing in the field of radiology who specialize in diagnostic radiology, radiation oncology, or medical physics.

Diagnostic radiologists may subspecialize in neuroradiology, nuclear radiology, pediatric radiology, and vascular and interventional radiology. In addition, diagnostic radiologists and radiation oncologists may subspecialize in hospice and palliative medicine. All of these disciplines are described below.

Diagnostic Radiology

A diagnostic radiologist uses x-rays, radionuclides, ultrasound, and electromagnetic radiation to diagnose and treat disease. Five years of training are required: one year of clinical internship followed by four years of radiology training. Anyone who wishes to specialize in one of the five subspecialty areas listed below must first certify in diagnostic radiology.

Subspecialties of Diagnostic Radiology

Neuroradiology

A specialist in neuroradiology diagnoses and treats disorders of the brain, sinuses, spine, spinal cord, neck, and the central nervous system, such as aging and degenerative diseases, seizure disorders, cancer, stroke, cerebrovascular diseases, and trauma. Imaging commonly used in neuroradiology includes angiography, myelography, interventional techniques, and magnetic resonance imaging (MRI). Two additional years—one year of a fellowship and one year of practice or additional approved training—are required.

Nuclear Radiology

A specialist in nuclear radiology uses the administration of trace amounts of radioactive substances (radionuclides) to provide images and information for making a diagnosis. Imaging that can involve nuclear radiology includes positron emission tomography (PET) and single photon emission computed tomography (SPECT) scans. One additional year of fellowship training is required.

Pediatric Radiology

A specialist in pediatric radiology uses imaging and interventional procedures related to the diagnosis, care, and management of congenital abnormalities (those present at birth) and diseases particular to infants and children. A

additional years—one year of a fellowship and one year of practice or additional approved training—are required.

Vascular and Interventional Radiology

A specialist in vascular and interventional radiology diagnoses and treats diseases with use of various radiologic imaging technologies, including fluoroscopy, digital radiography, computed tomography (CT), sonography, and magnetic resonance imaging (MRI). Therapies include angioplasty, stent placement, thrombolysis, embolization, biliary and genitourinary drainages, abscess drainages, and others. Two additional years—one year of a fellowship and one year of practice or additional approved training—are required.

Hospice and Palliative Medicine

A specialist in hospice and palliative medicine uses special knowledge and skills to prevent and relieve the suffering experienced by patients with life-limiting illnesses. This specialist works with an interdisciplinary hospice or palliative care team to maximize quality of life while addressing the physical, psychological, social, and spiritual needs of both patients and families.

Diagnostic Radiology and Interventional Radiology

An Interventional Radiologist combines competence in imaging, image-guided minimally invasive procedures and peri-procedural patient care to diagnose and treat benign and malignant conditions of the thorax (excluding the heart), abdomen, pelvis and extremities. Therapies include embolization, angioplasty, stent placement, thrombus management, drainage and ablation, among others. Training includes a minimum of three years of Diagnostic Radiology and two years of Interventional radiology, leading to primary certification in Diagnostic Radiology and Interventional Radiology.

Radiation Oncology

A radiation oncologist deals with the study and management of disease, especially malignant tumors, and radiological treatments of abnormal tissue through the use of x-rays or radionuclides. Training required is five years: one year of clinical internship, followed by four years of radiation oncology training. Anyone who wishes to specialize in hospice and palliative medicine must first certify in radiation oncology.

Subspecialty of Radiation Oncology

Hospice and Palliative Medicine (see description above)

Medical Physics

This branch of physics includes three specific discipline areas: therapeutic medical physics, diagnostic medical physics, and nuclear medical physics. A medical physicist uses physics to aid in the diagnosis and treatment of conditions and deals with the technology of the equipment, including radiation safety. The type of training varies per discipline. A certified medical physicist must specialize in at least one of the following but may hold certification in two areas or all three. (Please note that for ABR

Discipline Areas within Medical Physics**Diagnostic Medical Physics**

A specialist in diagnostic medical physics uses x-rays, gamma rays from sealed sources, ultrasound, and magnetic resonance in diagnostic procedures; maintains the equipment associated with their production and use; and applies standards for the safe use of radiation.

Nuclear Medical Physics

A specialist in nuclear medical Physics uses radionuclides (except those used in sealed sources for therapeutic purposes) for diagnosing and treating conditions; maintains the equipment associated with their production and use; and applies standards for the safe use of radiation.

Therapeutic Medical Physics

A specialist in therapeutic medical physics uses x-rays, gamma rays, electron and other charged particle beams, neutrons, and radiations from sealed radionuclide sources in the treatment of conditions; maintains the equipment associated with their production and use; and applies standards for the safe use of radiation.

Further information for patients and the public can be found on these websites:

RadiologyInfo

website: <http://www.radiologyinfo.org>

Current and accurate patient information about diagnostic radiology procedures, interventional radiology, and radiation therapy.

**American Board of Medical Specialties (ABMS)**

website: <http://www.certificationmatters.org/>

The American Board of Medical Specialties (ABMS), a not-for-profit organization, assists 24 approved medical specialty boards, including the ABR, in the development and use of standards for the ongoing evaluation and certification of physicians. Recognized as the "gold standard" in physician certification, ABMS believes higher standards for physicians mean better care for patients.

**image gently**

website: <http://www.pedrad.org/associations/5364/ig>

The *image gently* Campaign increases awareness of the opportunities to lower radiation dose in the imaging of children. The ABR and the ABR Foundation are partners in the Alliance for Radiation Safety in Pediatric Imaging.

ABR

5441 E Williams Circle
Tucson AZ 85711-
7411 520-794-2900

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Radiology

Version: 2.2.20